

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

)

) Chapter 9

)

) Case No. 13-53846

)

) Hon. Steven W. Rhodes

)

**ORDER GRANTING SYNCORA’S MOTION TO EXCLUDE THE
TESTIMONY OF THE CITY’S FORECASTING EXPERTS UNDER
FEDERAL RULE OF EVIDENCE 702**

This matter having come before the Court on the motion of Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (“Syncora”) for the entry of an order excluding the expert testimony of Robert Cline, Guarav Malhotra, and Caroline Sallee; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

IT IS HEREBY ORDERED THAT:

1. Syncora’s Motion to Exclude the Testimony of the City’s Forecasting Experts is GRANTED.

2. The Debtor, the City of Detroit (the “City”), is precluded from introducing testimony or opinions from Guarav Malhotra, Robert Cline, and Caroline Sallee.

3. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.